



United States Attorney
Southern District of New York

MEMO ENDORSED

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 3, 2021

5/4/21

(ASZ Ad) AS to all defendants
to July 14, 2021 at 11:00 AM
time excluded in the interest
of justice to facilitate the
review of discovery, and
plea discussions.

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Christian De La Torre Villalvazo et al., 20 Cr. 584 (CM)*

Dear Judge McMahon:

The Government writes to respectfully request, with consent from defense counsels, that the status conference currently scheduled for May 3, 2021, be adjourned for a period of 60 days. The adjournment will allow the Government to complete production of discovery, defense counsel to review discovery and decide what, if any motions are to be made, and for the parties to engage in discussions about potential pretrial resolutions of the matter.

Should the Court grant this request, the parties also request that the time be excluded under the Speedy Trial Act between May 3, 2021, through the next scheduled conference because the "ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A). The Government consulted with defense counsels, who do not object to the exclusion of time.

Very truly yours,

AUDREY STRAUSS
United States Attorney

USDC SDNY
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DATE FILED: <u>5/4/21</u>

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